

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 23 CR 8

KEVIN McCAA,

Defendant.

J.B.'S POSITION REGARDING MOTION FOR DETERMINATION
OF PRIVILEGE

MARK S. ROSEN, attorney for J.B., hereby submits the following:

Counsel for Kevin McCaa has moved this Honorable Court for an Order granting access to jail calls between J.B. and his attorneys, which had been recorded by the Dodge County jail. McCaa's defense attorneys had received these calls pursuant to a defense subpoena. DoC 120. The undersigned is presently counsel for J.B. in an unrelated matter. During this present course of representation of J.B., counsel has had phone conversations with J.B. which have taken place while J.B. was in the Dodge County jail. J.B. now invokes attorney client privilege so as to preclude the review, or utilization, of any such conversations which may have occurred

between J.B. and the undersigned.

Dated at Mequon, WI this 27th day of December, 2024.

Respectfully Submitted,

-s- Mark S. Rosen

Mark S. Rosen

Attorney for Defendant

State Bar No. 1019297

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